



## Compliance Audit Report 2015-2016 Austin Community College

According to Texas Administrative Code (TAC) §228.10(c), "An entity approved by the SBEC under this chapter...shall be reviewed at least once every five years under procedures approved by the Texas Education Agency (TEA) staff; however, a review may be conducted at any time at the discretion of the TEA staff." Per TAC §228.1(c), "All educator preparation programs are subject to the same standards of accountability, as required under Chapter 229 of this title." The Texas Education Agency administers Texas Administrative Code required by the Texas legislature for the regulation of all educator preparation programs in the state. Please see the complete Texas Administrative Code at [www.tea.texas.gov](http://www.tea.texas.gov) for details.

### **Contact Information: Jill Binder**

**County/District Number: 227502**

**SBEC Approval Date: August 1, 2003**

Program Specialist, Mixon Henry, conducted this Texas Education Agency Training Compliance Audit of Austin Community College (Austin C.C.) at Austin Community College in Austin, Texas, on February 23-24-25, 2016. The focus of the compliance audit was the Pedagogy and Professional Responsibility curriculum required for initial teacher certification. The following are findings and recommendations for program improvement.

### **Scope of the Compliance Audit:**

The scope of this audit is restricted solely to verifying compliance with Texas Administrative Code §227, §228, §229, §230 and §149.

### **Data Analysis:**

Information concerning compliance with Texas Administrative Code (TAC) governing educator preparation programs was collected by various qualitative means. A self-report was submitted to the Texas Education Agency on January 29, 2016. A review of documents, student records, course material, online courses, and curriculum correlations charts provided evidence regarding compliance. In addition, electronic questionnaires developed by TEA were sent to Austin Community College stakeholders and responses are as follows: Two (2) out of twelve (12) advisory committee member; fifteen (15) out of twenty-eight (28) clinical teachers/interns; six (6) out of twenty-three (23) principals; and eight (8) out of twenty-five (25) cooperating

teachers/mentors responded. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. Evidence of compliance was measured using a rubric aligned to Texas Administrative Code.

### **Findings, Compliance Issues, and Recommendations:**

“Findings” indicate evidence that was collected during the compliance audit process. If the program is “NOT in compliance” with any identified component, the program should consult the Texas Administrative Code and correct the issue IMMEDIATELY. A “compliance plan” may be drafted during the audit that identifies compliance issues to be addressed and a timeline for completion. Program “recommendations” are suggestions for general program improvement and no follow up is required.

### **Audit Process:**

TEA created a training, interactive audit which required participation of Austin C.C., Director Jill Binder and colleague Dr. Sarah Burkhalter. They assisted Mr. Mixon Henry in the review of evidence. All documents, except for student records, were submitted in advance of the on-site audit. At the end of the review of the documents and student records, the audit rubric was scored and results shared with the Austin Community College staff, Program Director Jill Binder and Dr. Sarah Burkhalter. A Compliance Plan was created to address the compliance issues noted in the audit.

## **COMPONENT I: Governance of Educator Preparation Programs- Texas Administrative Code (TAC) §228.20**

### **FINDINGS:**

- Program support was indicated by the governing body of Austin C.C. per TAC §228.20(c) as evidenced by the participation and cooperation of Austin C.C.’s Jill Binder and Dr. Sarah Burkhalter in various stages and steps of the compliance audit.
- The advisory committee consists of eleven (11) members: four (4) members are from local school districts, zero (0) members is from higher education, four (4) members represent community/business interests, and one (1) member is from ESC 13. Two (2) members were staff of Austin C.C. and were classifying themselves as Institutions of Higher Education (IHE). This was discussed during the audit and it was suggested to gain IHE from one of the four universities in the Austin area. This would provide objective input to the program from an IHE. Austin C.C. meets TAC §228.20(b) requirements for advisory committee composition.
- Austin C.C. provided evidence of two (2) advisory committee meetings over the last academic year. Austin Community College Educator Preparation Program had requested a hiatus due to low enrollment. The program returned two years ago, but did not start advisory committee meetings until 2015. The program had two (2) advisory committee meetings in 2015 (January 15 and August 12). Agendas, minutes, and sign in sheets were available as evidence of past advisory committee meetings. There was a discussion on ways to increase attendance at advisory committee meetings. Some recommendations included presenting meetings via webinars, phone conferences, or other technology formats. Additionally, it was suggested to send the recorded minutes

to all members and request feedback. The program does not meet the requirements for conducting a minimum of two advisory committee meetings per academic year as required by TAC §288.20(b).

- Austin C.C. does address the required items of design, delivery, program evaluation, and major policy decisions in the advisory committee agendas. The minutes verified items were presented and discussed. Thus demonstrating assistance by the advisory committee in design, delivery, program evaluation as required by TAC §228.20(b) is a compliance issue.
- Austin C.C. documented training the advisory committee members on their roles and responsibilities by providing a handbook per member and signed receipts verified the training during the August 12<sup>th</sup> meeting.

#### **Compliance Issues to be addressed:**

- Continue to meet twice yearly and document the input from advisory committee members in design, delivery, program evaluation, and major policy.

#### **Recommendations:**

- Consider rolling terms for advisory committee members in order to add new points of view;
- Establish what constitutes a quorum in order to conduct advisory committee business;
- Explore the use of technology to conduct the advisory committee meetings;
- Provide Continuing Professional Education (CPE) credit to the advisory committee members who need to earn hours toward certification renewal.

Based on the evidence presented, Austin Community College is **not in compliance** with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.

## **COMPONENT II: ADMISSION CRITERIA - Texas Administrative Code (TAC) §227.10**

#### **FINDINGS:**

- The historical requirement was a 2.5 GPA, but Austin C.C. is raising the GPA to 2.75 for the 2017 cohort. When reviewing candidate files, one GPA was below the 2.5 GPA required by TAC rule. Additionally, there was no policy in place nor letter on file in the candidate folder to provide the justification for the work experience being equivalent to the GPA. This was reviewed and discussed. It was discovered the previous administration had failed to address this issue. No other candidate was identified with this issue, so a preponderance of evidence did not make this a compliance issue. The

compliance issue is the program needs a policy to allow or deny candidates with work experience and low GPAs.

- Transcripts from accredited universities and colleges served as documentation of the required 12 hours in the candidates' specific content field or 15 hours in Mathematics and Science (10 of 10 candidate folders). In reviewing the transcripts, the content hours could be found. (TAC§227.10(a)(3)(C).
- Ten of ten candidate records had an application (TAC§227.10(a)(6).
- Basic skills were satisfied through the completion a bachelor's degree as identified in the Texas Success Initiative (TSI) exemption.
- Evidence of interviews was found in candidates' records with a rubric and a cut score, to evaluate whether the applicant met the program's criteria (10 of 10 candidate folders) The interview with rubric and cut score meets the requirement of interview or other screening device (TAC§227.10(a)(6).
- The Pre-Admission Content Test (PACT) is required prior to entering the EPP. This criteria was implemented for the 2015 -2016 cohort. Candidate folder from that cohort verify this change.
- Requirements for admission to the program are posted on the Austin C.C.'s website. These requirements are applied consistently to all candidates (TAC§227.10(a)(7).
- There were four out-of-country applicant chosen in the folder review. Candidates' whose first language is not English must demonstrate competence in the English language by submission of an official minimum score on the written or computer-based Test of English as a Foreign Language (TOEFL) with a speaking score of 26. In the review, only one of four TOEFL score were found in the candidate's record. The issue was discussed during the audit. So, there is a compliance issue due to the lack of language proficiency demonstrated prior to admitting the candidate into the program. Addition requirements include, the applicant must have his/her transcripts from an out-of-country non-English speaking university evaluated by an approved evaluation service. [TAC §227.10(7)]. Four of four the candidate's transcripts were reviewed by a TEA approved vendor.

#### **Compliance Issues to be addressed:**

- Require demonstration of English language proficiency prior to entering the program by the score of 26 on the TOEFL, or graduate from an accredited university or college within the United States, or graduate from a university outside of the United States where the language of instruction is English.
- Require program policy of the EPP which will identify what work experience would make a GPA below 2.5 is equivalent to the required GPA. Secondly, the EPP director must identify in writing how the candidate's work experience meet the EPP policy. That document should be kept in the candidate's folder.

#### **Recommendations:**

- Consider an oral reading assessment to determine the articulation, fluency, and comprehension of the candidates evaluated with a rubric.

- Consider limiting the additional requirements to items that address the skills, knowledge, and disposition of successful applicants.

Based on the evidence presented, Austin Community College is **not in compliance** with TAC §227 - Admission and Certification Criteria.

### **COMPONENT III: CURRICULUM - Texas Administrative Code (TAC) §228.30**

#### **FINDINGS:**

- Austin Community College is approved to offer teacher certification in ten (10) content fields and three (3) supplemental fields.
- The program curriculum is a face to face format that requires work sessions that have assessed deliverables.
- In reviewing the content and Pedagogy and Professional Responsibilities curriculum, it was noted that the educator standards were identified in the syllabi or modules, as well as identified specific topics required in the curriculum. This meets the requirement of TAC §228.30(a);
- The content and Pedagogy and Professional curriculum addressed the relevant Texas Essential Knowledge and Skills (TEKS). Additionally, TEKS are reflected in the activities and identified in candidates' lesson plans created in the courses. It would better serve the candidate, if the syllabi reflected TEKS applications [TAC §228.30(a)];
- Sufficient evidence was presented to verify that all candidates received instruction in: dyslexia and mental and emotional health [TAC §228.30(a)(4)].
- Instruction in reading (five elements: phonetics, phonemic awareness, vocabulary, reading comprehension, and fluency) can be identified in the Generalist EC-6 and 4-8 curriculum and content areas; i.e. 7-12 and EC-12 content areas TAC §228.30(b).
- Instructors for Austin C.C. are certified educators with a graduate degrees.

#### **Compliance Issues to be addressed:**

- No compliance issues noted in audit

#### **Recommendations:**

- Increase the number of lesson plans required to be created, critiqued, or expanded by the candidates in every course leading to certification in order to mirror the expectations for practicing classroom teachers to plan, instruct, and assess instruction. Provide an instructional scenario and have the candidate plan the lesson to adapt to several variables (learning style, differentiation, etc.) Provide a completed lesson plan and have the candidates modify it according to several variables. Also, have candidates complete a series of interrelated lessons into a unit of instruction to develop the skill of building on knowledge.

- Provide more differentiating instruction strategies in special populations' coursework (Gifted and Talented and Limited English Proficiency identified in mentor questionnaires).
- Develop additional coursework which deals with data management and interpretation to determine and address the learning needs of students.
- Utilize the TEA developed training for meeting "Teachers' Responsibilities for the STAAR test administration at <http://texas.testsecuritytraining.com/TestAdministratorTraining.aspx>. It may be used for a whole group or individually. A certificate can be printed upon completion and counted toward the required 300 clock hours. This is the same training that teachers must complete prior to STAAR testing.
- Utilize the dyslexia information found on the TEA website at <http://www.tea.state.tx.us/index2.aspx?id=4434> or at <http://www.region10.org/dyslexia/>.
- Utilize the mental and emotional health training approved by the Department of Human Resources and TEA. You may use any resources from other mental health organizations that you feel addresses the requirements of the law.
- Utilize the ethics training and the assessment of the training found at <https://www.youtube.com/playlist?list=PLYCCyVaf2g1vuF3qIz1NjEWFEMtxaBMvC> or use the information below.

A breakdown of the [ethics training](#) (outside source) is available.

The training is located on our TEA YouTube channel, and a playlist called "Texas Education Agency Teacher Ethics Training" is available to stream the ten video segments. Assessment for the training is available [here](#), and while it is not required, it is recommended.

**Module 1 (3 video segments)** - Boundaries, approximately 25 minutes in length

**Module 2 (2 video segments)** - Social Media, approximately 10 minutes in length

**Module 3 (3 video segments)** - Anger Management, approximately 10 minutes in length

**Module 4 (2 video segments)** - Behavior off Campus, approximately 10 minutes in length

The purpose of this training is to make teachers aware of their actions and hold them accountable for their behavior. Organizations are encouraged to keep a record signed by the educator that they have been trained on ethics. We also encourage teachers and education organizations to revisit ethics regularly to ensure that educators know and understand the district procedures in case an issue ever arises.

Based on evidence presented, Austin Community College is **in compliance** with Texas Administrative Code Section §228.30 – Educator Preparation Curriculum.

## **COMPONENT IV: Preparation Program Coursework and/or Training (TAC) §228.35**

### **FINDINGS:**

- The total program consists of 377+ clock hours for primary and secondary candidates TAC §228.35(a)(3).
- Eighty (80) clock hours of field-based experience (FBE) were required by the program, thirty of the eighty hours are for candidates to go and observe teachers in classrooms. The next fifty clock hours are a placement in a summer school setting in Round Rock ISD and Austin ISD. In this placement, the candidates interact with students, plan, and deliver lessons. The lesson is observed and critiqued by a program instructor. Feedback is provided to allow the candidate begin a reflected on their instructional practices. There were discussions held to clarify how to document the required hours. Since there were no logs or other documentation to verify required 15 clock hours of observation or 15 hours interactive activities with students. Without the proper documentation, this became a compliance issue according to TAC §228.35(d).
- Eighty hours of coursework prior to clinical teaching or internship was provided as per TAC §228.35(a)(3)(B).
- Two candidate were identified as a clinical teachers and were required to complete a minimum of 12 weeks in length TAC §228.35(d)(2)(A).
- Per TAC §228.35(d)(2)(C), in the Alternative Certification Program an internship of 180 school days or an academic year is an option for teaching candidates. In review of the candidate records, all candidate assignments matched the certification field for which the individual was accepted into the program and trained. In addition, according to TAC §228.35(d)(2)(C), the interns were issued the appropriate probationary certificate and classified as “teacher” of record on the campus PEIMS data. This was also verified by the candidate records.
- According to TAC §228.35(e), Austin C.C. candidates had mentors or cooperating teachers. Austin C.C. stated that the mentors or cooperating teachers were trained by their districts, but lacked documentation verify mentors’ training by the district.
- Supervision of each candidate is conducted with the structured guidance and regular ongoing support of experienced educators. Training of field supervisors was conducted in a meeting and was verified by email interactions of field supervisors involved TAC §228.35(f).
- Initial contact by the field supervisor was verified within the first three weeks of the assignment as required by TAC §228.35(f). This was completed in face-to-face meetings, emails, and phone calls. This was verified in candidate folders.

- Four observations conducted by Austin C.C. meets standards outlined in TAC §228.35(f)(3), during internship. Four observations were found in the candidates' records.
- The observations [TAC §228.35(f)(4)] were documented with a start and stop time reflecting at least 45 minutes in duration [TAC §228.35(f)].
- The first observation was conducted within the first six weeks of clinical teaching or internship as documented with observation forms in candidates' records and field supervisor logs TAC §228.35(f)(2).
- The field supervisor does provide and document instructional practices observed during the observation. The verification of the interactive conference with the candidates was not documented on the observation form, field supervisor log, or in candidate records TAC §228.35(f).
- The program did not consistently provide a copy of the written feedback to the candidate's campus administrator which is required by TAC §228.35(f).

**Compliance Issues to be addressed:**

- Require documentation of field base experiences that the FBEs take place in a variety of settings and document the interactive component (15 clock hours) required by law.
- Document mentor training; by either program or district training.
- Document interactive conferences following each observation and have all parties sign and keep documentation in candidate records.
- Provide a copy of the observation to the campus administrator.

**Recommendations:**

- Provide mentor teachers continuing professional education credit (CPE) for assisting a beginning teacher. (45 clock hours)

Based on evidence presented, Austin Community College is **not in compliance** with Texas Administrative Code Section §228.35 – PROGRAM DELIVERY AND ON-GOING SUPPORT.

**COMPONENT V: Assessment and Evaluation of Candidates for Certification and Program Improvement – Texas Administrative Code (TAC) §228.40**

**FINDINGS:**

- Austin C.C. has benchmarks documenting candidate's process through the program as prescribed by TAC §228.40(a). Documentation was found in the candidates' records.



- Criteria to determine the candidate’s readiness to test [TAC §228.40(b)] is in policies and procedures for candidates. The candidate must take and successful complete a practice exam to show content knowledge prior to being recommended for the PPR exam.
- Austin C.C. lacks a system to gather outside data for program evaluation. The program reviews internal information gathered from testing and end of course surveys from candidates. This was discussed during the audit and options for gathering external data was presented. This does not meet TAC §228.40(c) for program evaluation.
- According to TAC §228.40(d), the program retains documents that evidence a candidates’ eligibility for admission to the program and evidence of completion of all program requirements for a period of five years after program completion in a secure environment.

**Compliance Issues to be addressed:**

- Complete yearly program evaluations, gathering internal and external data, present and gain feedback from the advisory committee to better assess the program.

**Recommendations:**

- Use more external data in your overall program evaluations such as surveys from principals, mentors, former candidates, etc.

Based on evidence presented, Austin Community College is **not in compliance** with Texas Administrative Code §228.40 – ASSESSMENT AND EVALUATION OF CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT.

**COMPONENT VI: Professional Conduct (TAC) §228.50**

**Findings:**

- Austin C.C. has evidence that instructors and staff working with candidates have signed the Educator Code of Ethics. Candidates are provided instruction about the Educator Code of Ethics in coursework, along with the TEA ethics training, and each candidate signed a copy of the Educator Code of Ethics. This indicates by the candidate’s signature that they have read, understand, and will abide by Chapter 247 of this title (relating to Educators’ Code of Ethics).

**Compliance Issues to be addressed:**

No compliance issues noted

Based on evidence presented, Austin Community College is **in compliance** with Texas Administrative Code §228.50 – Professional Conduct.

## COMPONENT VII: Complaints and Investigations Procedures TAC§228.70

### Findings:

- Austin C.C. adopted and sent to TEA staff, for inclusion in the EPP's records, a complaint procedure that requires the EPP to timely attempt to resolve complaints at the EPP level before a complaint is filed with TEA staff. [TAC 228.70 (1)]
- Austin C.C. has posted on its website a link to the TEA complaints website and information regarding how to file a complaint under the EPP's complaint policy [TAC 228.70 (2)]
- Austin C.C. has posted a notification at all of its physical site(s) used by employees and candidates, in a conspicuous location, information regarding filing a complaint with TEA staff in accordance with subsection (c)(1) of this section [TAC 228.70(3)].
- Upon request of an individual, the EPP shall provide information in writing regarding filing a complaint under the EPP's complaint policy and the procedures to submit a complaint to TEA staff in accordance with subsection (c)(1) of this section [TAC 228.70(4)].

### Compliance Issues to be addressed:

No compliance issues noted

Based on evidence presented, Austin Community College Preparation Program (EPP) is **in compliance** with Texas Administrative Code §228.70(a) regarding Complaint Policy.

## COMPONENT VIII: Rules for Issuances of Certificates (TAC) §230

### Findings:

- Austin C.C. requires candidates to pass the TExES exam Generalist EC-6, Generalist 4-8, Core EC-6 or Core 4-8 prior to recommendations for a probationary certificates.
- Secondary candidates must qualify by demonstrating 24 hours of content coursework of which 12 hours must be upper division or pass the content test in their certification field.
- Candidates in the EC-12 certification areas must pass the TExES exam for their content area prior to the recommendation for the probationary certificate.
- For the recommendation for a standard certificate, Austin C.C. requires all coursework be completed, pass both the content exam and PPR exam, and have a successful clinical teaching experience or internship. This issue discovered during the audit was that candidates were being recommended and certified in more than

one certification area. A candidate should only be recommended in the area where he/she were prepared, completed clinical teaching or internship, and successfully tested. This was done historically and that practice has not continued. Multiple content recommendations does not meet Texas Administrative Code §230.37. Since no current candidates have been recommended for multiple certificates, it appears that practice has ceased.

**Compliance Issues to be addressed:**

No issues identified

Based on evidence presented, Austin Community College Educator Preparation Program (EPP) **is in compliance** with Texas Administrative Code §230.37 regarding issuance of certificates.

**General Recommendations:**

- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about current Texas Administrative Code;
- Continue to participate in webinars provided by the Division of Educator Preparation to ensure that the program staff is knowledgeable about current requirements and changes in Texas Administrative Code;
- Continue to maintain communication with the program specialist assigned to the program.
- Ensure that TEA staff has the most current contact information by sending updates to the assigned program specialist.